

K&L GATES

December 27, 2024

**By Email**

The Honorable Gregory H. Woods  
United States District Court  
for the Southern District of New York  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

**Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW**

Dear Judge Woods:

On behalf of Defendant Vadim Wolfson, I write with the government's consent to request that Mr. Wolfson's deadline for submitting a reply brief to the government's omnibus filing (ECF No. 93) be extended from January 6, 2024, to January 13, 2024. Co-defendant Gannon Bond has already requested and received an extension to January 13, 2024. *See* ECF No. 95. Granting Mr. Wolfson the same extension will create a uniform filing deadline. As further good cause, Mr. Wolfson requests the extension given the holidays in between the government's omnibus filing and the present January 6 deadline, and also given the need to evaluate complex technical arguments that the government has made for the first time in Exhibits Q and R of its filing.

Respectfully submitted,

/s/ David Rybicki

David Rybicki

*Counsel for Vadim Wolfson*